

1 C. D. Michel – SBN 144258  
2 [cmichel@michellawyers.com](mailto:cmichel@michellawyers.com)  
3 Sean A. Brady – SBN 262007  
4 [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
5 Konstadinos T. Moros – SBN 306610  
6 [kmoros@michellawyers.com](mailto:kmoros@michellawyers.com)  
7 MICHEL & ASSOCIATES, P.C.  
8 180 E. Ocean Blvd., Suite 200  
9 Long Beach, CA 90802  
10 Telephone: (562) 216-4444  
11 Facsimile: (562) 216-4445

12 Donald Kilmer-SBN 179986  
13 Law Offices of Donald Kilmer, APC  
14 14085 Silver Ridge Road  
15 Caldwell, Idaho 83607  
16 Telephone: (408) 264-8489  
17 Email: [Don@DKLawOffice.com](mailto:Don@DKLawOffice.com)

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**  
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;  
23 ANTHONY MIRANDA, an individual;  
24 ERIC HANS, an individual; GARY  
25 BRENNAN, an individual; OSCAR A.  
26 BARRETTO, JR., an individual;  
27 ISABELLE R. BARRETTO, an  
28 individual; BARRY BAHRAMI, an  
individual; PETE STEPHENSON, an  
individual; ANDREW HARMS, an  
individual; JOSE FLORES, an  
individual; DR. SHELDON HOUGH,  
DDS, an individual; SECOND  
AMENDMENT FOUNDATION; GUN  
OWNERS OF AMERICA; GUN  
OWNERS FOUNDATION; GUN  
OWNERS OF CALIFORNIA, INC.;  
THE LIBERAL GUN CLUB, INC.; and  
CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official  
capacity as Attorney General of the  
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF RICHARD  
MINNICH IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**42 U.S.C. §§ 1983 & 1988**

Hearing Date: December 4, 2023  
Hearing Time: 1:30 p.m.  
Courtroom: 9 B  
Judge: Hon. Cormac J. Carney

**DECLARATION OF RICHARD MINNICH**

1  
2 1. I, Richard Minnich, am the Treasurer of the California Rifle & Pistol  
3 Association, Incorporated (CRPA), a plaintiff in the above-entitled action. I make  
4 this declaration of my own personal knowledge and, if called as a witness, I could  
5 and would testify competently to the truth of the matters set forth herein.

6 2. CRPA is a non-profit membership organization classified under section  
7 501(c)(4) of the Internal Revenue Code and incorporated under the laws of  
8 California, with its headquarters in Fullerton, California.

9 3. Founded in 1875, CRPA seeks to defend the Second Amendment and  
10 advance laws that protect the rights of individual citizens. CRPA works to preserve  
11 the constitutional and statutory rights of gun ownership, including the rights to self-  
12 defense, the right to hunt, and the right to keep and bear arms. CRPA is also  
13 dedicated to promoting the shooting sports, providing education, training, and  
14 organized competition for adult and junior shooters. CRPA's members include law  
15 enforcement officers, prosecutors, professionals, firearm experts, and members of  
16 the public.

17 4. CRPA's membership includes thousands of individuals who possess current  
18 and valid California issued CCW licenses to carry a concealed firearm in public.

19 5. Because SB 2 would prohibit CRPA's members from carrying in many  
20 places where they often carry and are accustomed to concealed carrying a firearm,  
21 the utility of their CCWs, and thus their right to be armed for self-defense in public,  
22 will be severely curtailed and outright eliminated in many common locations.

23 6. For example, under SB 2 they cannot carry where alcohol for consumption  
24 on the premises is served. That means they cannot conceal carry at restaurants they  
25 patronize on a regular basis, nor carry in the parking area outside such an  
26 establishment.

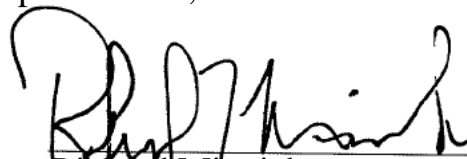
27 7. SB 2 also prohibits CRPA members in California from concealed carrying in  
28 parks and public lands they often frequent. And under SB 2, carry is prohibited at

1 urgent care facilities which CRPA members have used in the past for rapid medical  
2 attention and would use in the future. Under SB 2, carry is prohibited at financial  
3 institutions such as banks that CRPA members frequent.

4 8. Perhaps most significantly, under SB 2, concealed carry is prohibited at any  
5 privately owned commercial establishment that does not affirmatively display  
6 notice that the establishment tolerates concealed carry at the establishment's  
7 premises. There are many local businesses that CRPA members frequent that will  
8 likely not post such signs, forcing them to either not carry there or stop patronizing  
9 them.

10 9. These are just a few examples of how SB 2 harms our members. Suffice it to  
11 say, CRPA believes that SB 2 is abhorrent and incompatible with the general right  
12 of Americans, including Californians who are CRPA members, to carry a firearm in  
13 public for self-defense.

14 I declare under penalty of perjury that the foregoing is true and correct.  
15 Executed within in the United States on September 29, 2023.

16  
17  
18   
19 Richard Minnich  
20 Declarant  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**  
IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*  
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

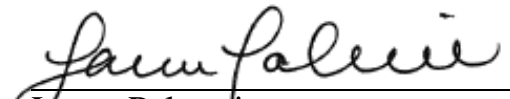
**DECLARATION OF RICHARD MINNICH IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Robert L. Meyerhoff, Deputy Attorney General  
California Department of Justice  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
Email: [Robert.Meyerhoff@doj.ca.gov](mailto:Robert.Meyerhoff@doj.ca.gov)  
*Attorney for Defendant*

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.

  
\_\_\_\_\_  
Laura Palmerin